

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: ZIMMER NEXGEN KNEE
IMPLANT PRODUCTS LIABILITY
LITIGATION**

MDL NO. 2272

Master Docket Case No.: 1:11-cv-05468
ALL CASES

This Document Relates to All Cases

JUDGE REBECCA PALMEYER

AFFIDAVIT OF PETER J. FLOWERS

Affiant duly deposed and under oath states as follows:

1. Affiant is an Attorney admitted to practice law in the State of Illinois as well as the Northern District of Illinois.
2. Affiant and every individual proposed for leadership of Plaintiffs' Steering Committee have substantial experience in successfully litigating these types of action.
3. As an example, nearly every firm in this Application participated recently in the very successful Medtronic and/or Guidant MDL litigation.
4. The individual application and/or individual or firm summary biography or *curriculum vitae* for each member of the proposed leadership group is attached as Group Exhibit 1.

Peter J. Flowers, Esq.

Subscribed and sworn to before me
this 18 day of August, 2011.

Erna K.
Notary Public

